

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF SETH  
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' *Daubert* Motion to Exclude Testimony of Defense Expert Janice K. Britt, Ph.D.

2. Attached hereto as Exhibit A is a true and accurate copy of the transcript of the deposition of Janice K. Britt, Ph.D., in MDL 2875, dated September 23, 2021.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel  
for Defendants*

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Dated: December 1, 2021

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